



## Privacy Notice –April 2019

### Abbey Capital Limited (the “Company”)

#### **The Purpose of this Privacy Notice**

This Privacy Notice applies to public and non-public personal information (“**Personal Data**”) that is collected by Abbey Capital Limited (referred to as “we”, “us” or “our” below).

The notice describes the standards that we follow for the collection, use, sharing and protection of Personal Data.

We may provide updated privacy supplements and notices so that you are aware of how and why we are using your Personal Data. These supplemental notices should be read together with this Privacy Notice.

#### **What Personal Data is collected?**

##### **Funds managed by Abbey Capital**

We may collect Personal Data relating to individuals that may be linked to funds managed by us (each a “**Fund**”), including directors, employees/officers of service providers, investors and potential investors.

For directors and employees/officers of the Funds and service providers, the Personal Data collected may include identification documents and contact details.

When an investor subscribes for shares or redeems shares in a Fund, the Personal Data collected includes:

- information the investor provides on subscription documents, applications and other forms, such as name, contact details, date of birth, social security number (tax id), occupation, assets, bank account details and income;
- information about transactions with a Fund; and
- information the investor provides to the Registrar and Transfer Agent to verify the investor’s identity or any beneficial owner’s identity, such as a passport.

##### **Employees**

We may collect Personal Data about our employees, potential employees and individuals linked to such employees. Such data may include contact details, date of birth, CVs, banking details, CCTV footage, salary history, records of disciplinary action (if any), health matters, documents related to employee performance reviews and any Personal Data you have provided to recruiters that has been sent to us.

##### **Business relationships**

We may collect Personal Data about individuals (or employees/officers of companies) that: (i) we have an existing business relationship with; or (ii) we may develop a relationship with in the future. Such data may include contact details, publically available Personal Data and Personal Data that you (or your employer) provide to entities/databases that we subscribe to.

##### **General**

We may collect the Personal Data you choose to provide to us. For example, if you contact us by letter, telephone, email, registration on our website – [www.abbeycapital.com](http://www.abbeycapital.com) or any other means of electronic or personal communication.

#### **What do we use this Personal Data for?**

We will only process your Personal Data where there is a lawful basis for us to do so. We will therefore process, or appoint agents to process, your Personal Data only:

- a) if you have consented to us doing so; or
- b) if we need it to perform the contract we have entered into with you; or
- c) if we need it to comply with a tax, legal or regulatory obligation; or
- d) if we (or a third party) have a legitimate interest for us doing so. Such legitimate interests include:

##### **Services relating to the Funds**

We use Personal Data to provide services on behalf of the Funds. Such services include the processing of investor requests, providing information, notices and disclosures relating to the Fund (for example, providing K-1 tax information to applicable investors) and assisting each Fund in complying with its legal obligations (including company law and tax law requirements).



## Employer obligations

Employee's Personal Data may be used and disclosed to third parties as permitted or required by applicable law to ensure that we meet our obligations as an employer. Such third parties may include tax and regulatory authorities, pay-roll providers, HR service providers, pension providers and health insurance providers.

## Business relationships

Personal Data may be used and stored on our systems, including our business relationship software. This allows us to easily identify relationships and previous correspondence with you. We may also inform you about products and services that may be of interest. You will be given the opportunity to unsubscribe to such information.

To facilitate the above, Personal Data may be accessible to employees of our wholly owned subsidiary Abbey Capital (US) LLC and also provided to regulatory and tax authorities where required and a number of third party service providers we use to provide logistical, administration and systems and software services (for example - couriers, management information systems and tax/accounting services).

You should note that Personal Data may be transferred to service providers and global affiliates of such service providers that are situated in countries which may not have the same data protection laws as in Ireland. Such countries may include Bermuda, Cayman Islands, Canada, the United States of America and the Philippines.

## How do we Protect Personal Data?

Access to Personal Data is limited to our employees/officers (and employees/officers of our wholly owned subsidiary Abbey Capital (US) LLC) who require it in order to conduct business.

We have put in place technical and organisational measures to ensure a level of security appropriate to the nature, scope and purpose of its processing of personal data.

If the Personal Data is shared with third party service providers, the third parties will process such data in accordance with applicable data protection laws.

We (and applicable service providers) may disclose personal information with non-affiliated companies and regulatory authorities as permitted or required by applicable law.

Except as described in this Privacy Notice, these parties will not use personal information on investors for any other purpose unless they describe how such information will be used at the time the investor discloses it to these entities or they obtain the investor's permission to do so.

## How long will we retain Personal Data?

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting retention requirements and any legitimate business interests.

To determine the appropriate retention period for your Personal Data, we will consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## Your rights in relation to your Personal Data

We will give you reasonable access to your Personal Data that we hold. We encourage investors in the Funds to review investor statements and notify us if any information should be corrected or updated.

You have rights in relation to your Personal Data, including the right to update or correct data, receive details of the Personal Data held, ask for the Personal Data to be erased, to be provided to another controller or, if consent is required, the right to withdraw consent regarding the use of Personal Data.

In some cases, there may be reasons that we cannot accede to a particular request, for example - where local retention periods require the holding of Personal Data for a certain period of time or such data is required to perform our regulatory and legal obligations. If we cannot accede fully to a data subject access request, we will respond as soon as possible with reasons.

If you have a question or concern about your Personal Data, this Privacy Notice or your rights please contact us at [info@abbeycapital.com](mailto:info@abbeycapital.com). We have in place measures to ensure that these requests can be actioned within applicable timescales.

You also have the right to make a complaint at any time to the Irish Data Protection Commissioner in relation to the processing of your Personal Data in Ireland – <https://dataprotection.ie/>.